REMARKS

Claim 1 was rejected as being anticipated by Sattar et al, US Patent 5,572,581.

Applicants respectfully traverse.

Regarding the "protocol" that is specified in claim 1, the Examiner pointed to col. 7, lines 18-33 of the reference and asserted that:

> The instruction/data package sent to IP 42, via SCP 24, indicates what services are required or needed for the calling party, which may include tax retrieval, voice recognition, text-to-voice functions, digit collections, etc.

The Examiner continued:

> For example, faxing, voice, and text-to-voice conversion, each requires a different type of "communication protocol"

and concluded that:

> In Satter, the instruction/data package specifies the "communication protocol," (such a the protocol needed for faxing, voice, or text to voice conversion) and therefore, reads on "communication protocol parameter".

Applicants agree with the first-quoted passage above, disagree with the second-quoted passage above, and disagree with the conclusion. In a nutshell, applicants respectfully submit that the Examiner mistakenly considers the notion of executing different _functions_ as employing different _protocols_.

Applicants agree that the cited passage teaches that SCP 24 can request IP 42 to perform different functions, such as DTMF decoding or voice synthesis. Another passage in Sattar et al teaches that fax retrieval and reporting functions can be requested of IP 42, as well as voice recognition. But these are all _functions_, or _tasks_, that are carried out, or executed. Hence, the Examiner's assertion that "tax retrieval, voice recognition, text-to-voice functions, digit collections, etc" are carried out in response to an instructions/data package sent to IP 42 via SCP 24 is valid; _but only the extent_ that the statement pertains to different _functions_ that can be executed, or carried out.

That says nothing (i.e., it is simply silent) about the communication _protocol_ that is being used, or employed.

The term "communication protocol" means a set of rules for data representation, signaling, authentication and error detection that is required to send information over a communications channel. See, for example, Wikipedia.com. Unless the parties on two

4

ends of a communication channel follow same rules, the system would not work properly. That is why the parties must agree – either beforehand, or with a special alert message – as to which communications protocol will be employed.

It is clear that different functions can be executed using the same communications protocol, and correspondingly, different communications protocols can be employed to carry out a particular function.

What the Examiner has pointed out is that different <u>functions</u> can be carried out by the IP of Sattar et al. That is totally different from the communications <u>protocol</u> that claim 1 specifies.

Amended claim 1 even more clearly specifies that the communications protocol that is specified pertains to communication *between the database and the intelligent processor*. In the context of the Sattar et al arrangement, however, the business of decoding DTMF signals to collect digits, voice recognition or voice synthesis, which come to IP 42 of Sattar et al from switch 10 via channel 44, has nothing to do with the protocol for communications between the database and the intelligent peripheral; and that makes claim 1 even more clearly not anticipated by Sattar et al.

At least because of the above, applicants respectfully submit that claim 1 is not anticipated by Sattar et al.

New claims 16-21 are more detailed than claim 1, containing the limitation of employing different protocols as well as other limitations.

In light of the above amendments and remarks, reconsideration and allowance of claim 1, 16-21 are respectfully solicited.

Respectfully,
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5